

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SANG LAN

Case No. 11 CV 2870

Plaintiff,

Notice of Motion

- against -

No Oral Argument Required

AOL TIME WARNER, INC., THE UNITED STATES
GYMNASTICS FEDERATION d/b/a USA GYMNASTICS,
TIG INSURANCE COMPANY, TIG SPECIALTY
INSURANCE SOLUTIONS, RIVERSTONE CLAIMS
MANAGEMENT, LLC, TED TURNER, K.S. LIU
(CHINESE NAME 刘国生), GINA LIU AKA
K.S GINA HIU-HUNG (CHINESE NAME 谢晓虹),
WINSTON SIE (薛伟森), HUGH MO (莫虎) , JOHN
DOES AND JANE DOES # 1 THROUGH 15, INCLUSIVE

Defendants.

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PLEASE TAKE NOTICE that upon the attached affidavit of Ping Lu, Declaration
affirmation of Ming Hai, attorney for plaintiff, with exhibits, and upon all prior pleadings
and proceedings, the undersigned will move this Court, at the Courthouse, 500 Pearl
Street, New York NY, for an order for leave to amend the complaint as an attachment to
this Motion pursuant to Rule 15 (a), Rule 15 (c) and Rule 15 (d). And granting such other
and further relief as the Court deems proper.

Dated: FLUSHING, New York
June 8th, 2011

LAW OFFICE OF MING HAI, PC

By:


MING HAI
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